

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GAVRIELI BRANDS LLC, a California
Limited Liability Company,

Plaintiff,

v.

SOTO MASSINI (USA) CORPORATION, a
Delaware corporation; and THOMAS
PICHLER, an individual,

Defendants.

C.A. No. 18-462-MN

JOINT PROPOSED JUDGMENT FOLLOWING JURY VERDICT

The parties respectfully submit the following proposed judgment for entry pursuant to Federal Rule of Civil Procedure 58 following the jury's verdict rendered on May 3, 2019.¹

Dated: May 10, 2019

/s/ Amy M. Dudash

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¹ Remaining issues relating to permanent injunctive relief, the amount of enhanced damages due to the jury's finding that Defendants infringed the patents willfully, intentionally infringed Plaintiff's trade dress, and intentionally engaged in false advertising, the amounts of pre-judgment and post-judgment interest owed, taxing of costs, and a determination whether an award of attorneys' fees is warranted and, if so, in what amount, shall be addressed separately. Also to be addressed separately are Defendants' post-verdict issues including motion(s) under Rule 50(b) and/or Rule 59 on all jury findings, and issues relating to whether personal liability is warranted as a matter of law.

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